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Attorneys for Defendant Tenza Trading Ltd.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company,

Plaintiff,

vs.

TENZA TRADING LTD., a Cyprus
Company,

Defendant.

No. 3:13-cv-01045-SI

JOINT STIPULATED MOTION TO EXTEND
TIME FOR COUNTER-DEFENDANT
ALEXANDER ZHUKOV TO RESPOND TO
THE FIRST AMENDED COUNTERCLAIM
OF COUNTERCLAIMANT TENZA
TRADING LTD.

PURSUANT TO LR 16-3

TENZA TRADING LTD., a Cyprus
Company,

Counterclaim Plaintiff,

vs.

CALISTA ENTERPRISES LTD, a
Republic of Seychelles Company; and
ALEXANDER ZHUKOV, a
Czechoslovakian citizen,

Counterclaim Defendants.

Tenza Trading Ltd. (hereafter “Tenza”), Calista Enterprises, Ltd. (hereafter “Calista”) and Alexander Zhukov (hereafter, “Mr. Zhukov”) submit the following stipulated motion.

Local Rule 7.1 Certification

The undersigned counsel certify that the motion at issue is stipulated by counsel.

Motion

The parties request a brief extension of thirty days for Mr. Zhukov to file and serve a pleading in response to the First Amended Counterclaim of Tenza Trading Ltd. Mr. Zhukov’s response is currently due Monday, September 22, 2014. Mr. Zhukov’s response would, therefore, be due October 22, 2014.

The parties have made substantive progress towards settlement and believe that a stipulated resolution to the litigation is imminent. In light of the likelihood of settlement, neither party wishes to incur the costs associated with a response to the First Amended Counterclaim by Mr. Zhukov.

This motion is made in good faith and not for purposes of delay. The requested extension

will not require any modifications to any other case management dates that have been set by the Court.

Dated this 19th day of September, 2014.

Respectfully submitted,



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